

To: Scott Berman, Interim COO, and CDFI Fund

From: Jerry Konohia

Date: May 7, 2010

Re: enabling statute amendments- comments

The following are submitted in connection with the invitation for comments contained in Federal Register volume 75 No 44pp10561

The following comments are submitted pursuant to volume 745 no 44 of the federal register pp 10561 ET, seq.

1. General Comment – First, the fund is strongly urged to evaluate and craft all amendments to the enabling statute with the objective of causing the development of a network of competent and able cdfi's which are integrated and diversified (vertically and horizontally) across geographic, functional and target activities (i.e. community development, affordable housing and job b creation) . The statute in its current form, has resulted, at best, in the beginnings of such a system but lacks the deliberate intent to complete the task. Second, the statute should allow the cdfi fund and the director to retain sufficient discretionary authority relative to structure programmatic design and resource allocation, to support its agility and adaptivity to shifts ion the market, likely to occur during the next 5-10 years while the nations' economy recovers.
2. Community development advisory board- consistent with the forgoing- the advisory board should be constituted so as to ensure that the fund remains in touch with the market's vertical (retail, community; wholesale; national and secondary market) and horizontal (geographic market)
3. Certification and recertification -standards should be designed to ensure representation of the needs of the markets broadest set of needs. Recertification should be conditioned on recent measurable relevant community impact and the entity's perceived ability to adapt to market changes.